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1 2 3 4 5 6 7	JOHN O'CONNOR O'Connor & Associates One Embarcadero Center, Suite 1020 San Francisco, CA 94111 Telephone: 415-693-9960 Facsimile: 415-981-0222 BRUCE A. SINGAL DAMIEN C. POWELL Donoghue, Barrett & Singal, P.C. One Beacon Street Boston, MA 02108 Telephone: (617) 720-5090 Facsimile: (617) 720-5092 Appearances Pro Hac Vice		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11) NO. C07-03732-VRW		
12	U.S. SMALL BUSINESS ADMINISTRATION, as Receiver for STIPULATION TO EXTEND THE		
13	PROSPERO VENTURES, L.P., DEADLINE FOR CONDUCTING A MEDIATION AND PROPOSED ORDER		
14	Plaintiff(s), THEREON		
15	v.) Related Cases:) C07-03741-VRW; C07-03736- VRW;		
16	JANE C. SLOANE) C07-03737- VRW; C07-03738- VRW; C07-03739-VRW		
17	Defendant(s).		
18			
19			
20	This stipulation is entered into by and between the Defendant, JANE C. SLOANE, and the		
21	Plaintiff, U.S. Small Business Administration, as Receiver for PROSPERO VENTURES, L.P.,		
22	pursuant to ADR Local Rule 6-5, on the following recitals, terms, and agreements:		
23	RECITALS		
24	This stipulation is entered into with the following facts taken into consideration:		
25	A. On November 2, 2007, the Plaintiff and Defendant filed a Stipulation and		
26	Proposed Order Selecting Mediation.		
27	B. On November 27, 2007, the Court referred the case to mediation. The current		
28	deadline for completing the mediation session is February 25, 2008.		
	Stipulation to Extend Deadline		

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- C. The above-referenced Defendant and the defendants in the five listed related cases (collectively the "Defendants") are all represented by the same law firms.
- D. In order to avoid duplication of efforts and to promote judicial economy, the Plaintiff and the six Defendants agreed to mediate their disputes in one mediation session conducted by the same mediator.
- E. On November 21, 2007, Plaintiff's counsel and Defendants' counsel participated in an initial ADR phone conference with ADR Program Staff Attorney Daniel Bowling.
- F. On November 29, 2007, the ADR Program appointed James Barber, Esq. to serve as the mediator for the six above-referenced related cases.
- G. On December 18, 2007, Plaintiff's counsel and Defendants' counsel participated in a pre-mediation phone conference with Mr. Barber. Defendants' counsel informed Plaintiff's counsel and Mr. Barber that the first available date on which the Defendants and Defendants' counsel are available for a joint mediation session is during the third week in February, 2008. Defendants' counsel explained that two of the Defendants are currently abroad and will not be returning to the United States until February. All Defendants will be present for the mediation.
- During the phone conference, Plaintiff's counsel and Defendants' counsel agreed H. to conduct the joint mediation session on February 26, 2008, and, if needed, February 27, 2008, subject to this Court's approval.
 - Mr. Barber is available on February 26, 2008 and February 27, 2008. I.
- J. In order to conserve resources and permit the parties to mediate all six related cases at the same time, the parties request an extension of the deadline for completing the mediation until February 27, 2008.

STIPULATION

With the above facts taken into consideration, the adequacy and sufficiency of which are hereby acknowledged, the parties do hereby stipulate and agree as follows:

1. The deadline for conducting the mediation session shall be extended until February 26, 2008.

1	2. This stipulation may be executed in counterparts and a facsimile and/or electronic		
2	signature shall be considered as valid as an original.		
3	B B	SOMEONINE DADDETT & COLOAL D.C.	
4	• •	DONOGHUE, BARRETT & SINGAL, P.C.	
5	, <u> </u>	By: /s/ Damien C. Powell Bruce A. Singal Damien C. Powell	
6		Appearance Pro Hac Vice	
7		Attorneys for Defendant, JANE C. SLOANE	
8			
9		O'CONNOR & ASSOCIATES	
10		John O'Connor Attorney for Defendant,	
11		JANE Č. SLOANE	
12	Dated: January 3, 2008	COLEMAN & HOROWITT, LLP	
13			
14		By: <u>/s/ Darryl J. Horowitt</u> Darryl J. Horowitt	
15		Attorneys for Plaintiff	
16	1	ROPOSED ORDER	
17			
18	The parties having stipulated, and good cause appearing,		
19	IT IS HEREBY ORDERED that:		
20	1. The deadline for condu	cting the mediation session shall be extended until February	
21	27, 2008.		
22	2. No further extensions s	hall be granted absent extraordinary circumstances.	
23		STES DISTRICT	
24		ESTA CE	
25	Dated: January 8, 2008	GRANTED	
26		Judge Vaughn R Walker	
27		HONORAGA TOGHN R. WALKER U.S. DISTRICT COURT	
28		NORTHERN SUSTRICOP CALIFORNIA	
		3	

Stipulation to Extend Deadline

PROOF OF SERVICE

I. Damien C. Powell, admitted pro hac vice in the United States District Court, Northern District of California, declare:

I am a citizen of the United States of America and a resident of the Commonwealth of Massachusetts. I am over the age of eighteen (18) years. My business address is Donoghue, Barrett & Singal, P.C., 1 Beacon Street, Boston MA 02108. The business address of John O'Connor, Esq., the local counsel to the defendant, is One Embarcadero Center, Suite 1020, San Francisco, California 94111.

On January 3, 2008, I served the foregoing document(s) described as STIPULATION TO EXTEND THE DEADLINE FOR CONDUCTING A MEDIATION AND [PROPOSED] ORDER THEREON on the interested parties, at the addresses as stated below.

Via Electronic Mail:

Arlene P. Messinger US Small Business Administration 409 3rd St SW 7th Flr Washington, DC 20416 202-205-6857

Christine Jean Levin

Coleman & Horowitt, LLP 499 W. Shaw Avenue Ste. 116 Fresno, CA 93704 559-248-4820 Email: clevin@ch-law.com

Darryl J. Horowitt

Coleman & Horowitt, LLP Attorneys at Law 499 West Shaw Suite 116 Fresno, CA 93704 559-248-4820

Fax: 559-248-4830

Email: dhorowitt@ch-law.com

Via Federal Express Overnight

Hon. Vaughn R. Walker U.S. District Court, Northern District 450 Golden Gate Avenue San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 3, 2008, in Boston, Massachusetts.

Damien C. Powell